

1      Pamela M. Egan, WSBA No. 54736  
2      POTOMAC LAW GROUP PLLC  
3      1905 7<sup>th</sup> Ave. W  
4      Seattle, WA 98119  
5      Telephone: (415) 297-0132  
6      Email: [pegan@potomaclaw.com](mailto:pegan@potomaclaw.com)  
7      *Attorneys for Mark D. Waldron, Chapter 7 Trustee*

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

**UNITED STATES BANKRUPTCY COURT**  
**EASTERN DISTRICT OF WASHINGTON**

In re:  
GIGA WATT, Inc., a Washington  
corporation,  
Debtor.

Case No. 18-03197 FPC 11  
The Honorable Frederick P. Corbit  
Chapter 7

MARK D. WALDRON, as Chapter 7  
Trustee,

Adv. Case No. 20-80031

Plaintiff,  
vs.  
PERKINS COIE LLP, a Washington  
limited liability partnership,  
LOWELL NESS, individual and  
California resident, GIGA WATT  
PTE., LTD., a Singapore corporation,  
and ANDREY KUZENNY, a  
citizen of the Russian Federation,

**SUBMISSION OF SIGNED  
VERIFICATION TO AMENDED  
VERIFIED COMPLAINT FOR (I)  
BREACH OF FIDUCIARY DUTY  
TO GIGA WATT, INC.,  
(DEFENDANTS PERKINS COIE  
LLP AND LOWELL NESS) (II)  
AIDING AND ABETTING GIGA  
WATT PTE. LTD.'S BREACH OF  
FIDUCIARY DUTY TO GIGA  
WATT (DEFENDANTS PERKINS  
COIE LLP AND LOWELL NESS),  
(III) BREACH OF FIDUCIARY  
DUTY TO GIGA WATT  
(DEFENDANT GIGA WATT PTE.  
LTD.) AND (IV) AIDING AND  
ABETTING BREACH OF  
FIDUCIARY DUTY  
(DEFENDANT ANDREY  
KUZENNY)**

Defendants,  
- and -  
THE GIGA WATT PROJECT, a  
partnership,  
Nominal Defendant.

SUBMISSION OF VERIFICATION - Page | 1

## VERIFICATION OF AMENDED/CORRECTED COMPLAINT

I, Mark D. Waldron, am the duly-appointed Chapter 7 Trustee in the above-captioned bankruptcy case. I have reviewed the Complaint. I believe the allegations set forth therein are true based upon my personal knowledge and where applicable based on my investigation and review of documents in this case.

I declare under penalty of perjury that the foregoing is true.

Signed this 19<sup>th</sup> day of November 2020 in Tacoma, Washington.

Mark D. Waldron, in his capacity as  
the Chapter 7 Trustee